



U.S. Department of Justice

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March 6, 2022

The Honorable Catherine C. Blake
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Farace et al.*,
Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace (“R. Farace”) and Joseph Farace (“J. Farace”), have each been charged in a one-count indictment charging them with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). The defendants had their initial appearances, and J. Farace his arraignment, on October 8 and October 6, respectively.

The parties thereafter met and conferred regarding discovery as required by Rule 16.1. The government believe it has now substantially completed Rule 16 discovery, and that defense counsel has had time meaningfully to review it. The parties are now engaged in discussions to determine if these matters can be resolved short of a trial and respectfully request a status update in 45¹ days to either set a motions schedule or apprise the Court of the possibility of pre-trial resolution. The parties have further agreed, for similar reasons, to toll the Speedy Trial Clock during this period, and will file a motion in this regard forthwith.

¹ Counsel for Joseph Farace (Mr. Gerry Ruter) consented to a period of 30 days. Subsequently, counsel for Ryan Farace (Mr. David Walsh-Little) suggested a period of 45 days to discuss potential pre-trial resolutions. The government has no reason to believe Mr. Ruter will object to the additional 15-day period of tolling. However, as of the filing of this report, Mr. Ruter has not indicated his consent or objection to that additional 15-day period.

Dana J. Brusca, Esq.
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Very truly yours,

_____/s/_____
Dana J. Brusca
Assistant United States Attorney

cc: Gerry Ruter, Esq. (via ECF)
David Little-Washington, Esq. (via ECF)